

MAHER & PITTELL, LLP

ATTORNEYS AT LAW

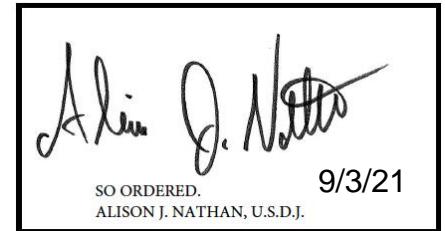
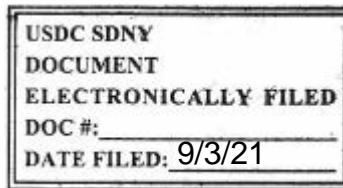
Reply To:

**42-40 Bell Blvd, Suite 302
Bayside, New York 11361
Tel (516) 829-2299
jp@jpittell.com**

*Long Island Office
10 Bond St, Suite 389
Great Neck, New York 11021
Tel (516) 829-2299
jp@jpittell.com*

September 2, 2021

Hon. Alison J. Nathan
U.S. District Court
40 Foley Sq
New York, NY 10007



Re: Habeas Petition / Motion for Return of Property
Le v. U.S.A., 20 cv 1782 (AJN) - *U.S.A. v. Le*, 15 cr 38 (AJN)

Dear Judge Nathan:

I am counsel to *Cheng Le*, the Petitioner/Defendant in the above referenced matters.

I submit this letter to provide the Court a status update and request a modification of the pending briefing schedule.

Currently my submissions on behalf of Mr. Le (the reply in further support of his habeas petition and the supplemental submission regrading his property motion) are due on September 3, 2021. I had anticipated submitting them by this deadline. However, earlier today, I had a legal call with Mr. Le. Pursuant to the call, I seek to send him a draft of my submission for his review prior to submission to the Court. In addition, as referenced in Mr. Le's submissions relating to the property motion, he sought a return of seized electronic items in order to arrange for a forensic review of them in further support of the claims asserted in his habeas petition. Although, the physical items have been destroyed, I have conferred with the Government about obtaining a copy of the data (extracted from these items) previously produced in discovery. In addition, during the course of my review of this matter, and pursuant to my discussion with Mr. Le, I may seek to file a motion requesting leave to amend the habeas petition.

Wherefore, based upon the foregoing, with consent of the Government, I respectfully request the submission schedule be modified as follows: Mr. Le's submissions due on November 5, 2021 and the Government response due on December 6, 2021.

SO ORDERED.

Respectfully submitted,
/s/
Jeffrey G. Pittell

cc: AUSA Ilan Graf
Cheng Le